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ABSTRACT

The Library Services and Construction Act (LSCA) Amendments of 1990 required the General Accounting Office (GAO) to conduct a review of the Department of Education's Research Library, which is a component of the Office of Educational Research and Improvement (OERI). Data were gathered by interviewing one researcher and four librarians familiar with the Library's collection to obtain their views on the scholastic and historic value of the collection, and by interviewing representatives of 20 key education associations and library organizations to obtain their views on the need for expanding access to the Library. It was found that the Library lacks a collection development policy specifying its primary and other users and its materials' acquisition and preservation priorities and practices; most education employees and half of the education-related organization representatives interviewed rarely if ever use the library; experts believe the Library's historical collections are potentially very useful, but its contemporary collection is less comprehensive; and lack of funding for technical processing since 1988 has resulted in about half of the collections being uncataloged and many books in the historical and special collections remaining in need of preservation. A collection development policy under development at the time of this report was scheduled for implementation in August 1991, and organization representatives suggested that better publicizing of and access to the Library's services would improve its usefulness. Seven appendixes include data on Department of Education Research Library non-personnel expenditures (fiscal years 1980-90) and the views of library experts and representatives on expanding public access to research libraries. (BBM)

ED333897

United States General Accounting Office

GAO

Report to Congressional Committees

April 1991

EDUCATION'S LIBRARY

Actions Needed to Improve Its Usefulness

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United States
General Accounting Office
Washington, D.C. 20548

Human Resources Division

B-242670

April 11, 1991

The Honorable Edward M. Kennedy
Chairman, Committee on Labor
and Human Resources
United States Senate

The Honorable William D. Ford
Chairman, Committee on Education
and Labor
House of Representatives

The Library Services and Construction Act Amendments of 1990, Public Law 101-254, Section 9, require GAO to conduct a review of the Department of Education's Research Library. Our work is intended to assist in upcoming congressional deliberations regarding alternatives for the Research Library's future, which will be considered during reauthorization hearings on Education's Office of Educational Research and Improvement (OERI).

The legislation required us to study and report on the (1) scholastic and historic value[1] of the Library's collection, (2) effectiveness of its services provided to Education employees, and (3) need to expand public access to the Library. In addition, in discussions with staff of the House Education and Labor Committee, we agreed to develop general information on the Library's functions and activities. This report summarizes the results of our review.

We identified and interviewed one researcher and four librarians[2] familiar with the Library's collection to obtain their views on the scholastic and historic value of the its collection. In addition, we interviewed representatives of 20 key education associations and library organizations to obtain their views on the need for expanding access to the Library. We judgmentally selected these organizations generally based on their large nationwide memberships comprised of researchers, teachers, parents, students, school administrators, state and local

[1]For the purposes of this report, we defined the Library's scholastic value as its usefulness to education researchers, and its historic value as its usefulness to historians and others tracing the history of American education.

[2]These include John Collins, Librarian, Monroe C. Gutman Library, Harvard Graduate School of Education; Leslie F. DiBona, Head of Technical Services, Monroe C. Gutman Library; Jane Franc, Director, Milbank Memorial Library, Teachers College, Columbia University; Nancy O'Brien, Acting Head, Education and Social Science Library and Associate Professor of Education, University of Illinois Urbana-Champaign; and Richard L. Venezky, Unidel Professor of Education Studies, University of Delaware.

policymakers, business leaders, and librarians. In addition, several of these organizations have letters on file with the Library requesting access to its materials. (See app. I.)

We developed a guide for conducting the interviews and obtained comments on a draft of the guide from Education officials and either current or former officials of the United States Commission of Libraries and Information Services; the Gutman Library, Harvard Graduate School of Education; and the American Library Association. In addition, we used information from a July 1989 Education survey of its employees regarding their use of the Library.

Our review was conducted from January to December 1990, in accordance with generally accepted government auditing standards.

Background

Section 423(a) of the Department of Education Organization Act (P.L. 96-88) authorized the Secretary of Education to establish a central library service. Under this authority, the Research Library officially became part of the Department when it was established in 1979. Before that time, the Library was known as the National Institute of Education (NIE) Library and was located in the former Department of Health, Education, and Welfare (HEW). Education's Research Library is the major federal education library. It consists of the Library Section and the Education Reference Center Section. These sections report to the Director, Office of Library Programs.[3]

The Library Section maintains a major collection of books, periodicals, and microforms and conducts routine library activities, such as acquisitions, cataloging, circulation, interlibrary loans, and reference services. The Library provides the public limited access to its materials through on-site use of its collections, telephone reference services, and interlibrary loans.

The Education Reference Center Section provides comprehensive research assistance to senior Department staff and responds to education-related inquiries from all staff.

[3]We focused our report on the Library Section because the study's objectives primarily related to this section's activities.

The library is a component of OERI. Along with OERI's other offices, the Library is located at 555 New Jersey Avenue, N.W., in Washington, D.C. This location is about 1 mile from Education's headquarters.

Research Library officials estimate that it contains 250,000 to 300,000 volumes,[4] including both contemporary and historical collections.[5] The Library has special collections consisting of rare books, early American textbooks, and state education journals. Its special collections contain volumes dating back to the 15th century. Appendix II contains a more detailed description of the Library's collection. As of March 1991, the Library had 14 full-time and 1 part-time employees, including 9.5 full-time equivalent staff in the Library Section and 5 such staff in the Education Reference Center Section. The position of Chief, Research Library, has been filled on an acting basis since 1987. OERI allocated $350,000 in fiscal year 1991 to support Library operations, excluding personnel costs. These funds are used for periodicals, new acquisitions, planned equipment upgrades, and supplies.

Results in Brief

The Education Research Library lacks a collection development policy specifying (1) its primary and other users and (2) its materials' acquisition and preservation priorities and practices. In our view, this has prevented the Library from making sound and consistent decisions on collection development and services. OERI officials are now developing such a policy for implementation in August 1991.

Most Education employees and 11 of the 20 education-related organizations we interviewed rarely if ever use the Library. Organization representatives told us that better publicizing of and access to its services would improve the Library's usefulness.

Experts believe the Library's historical collections are potentially very useful to historians and education researchers. They consider its contemporary collection to be less comprehensive than its historical collection.

[4]Based on estimated number of volumes, the Education Research Library ranks second among the largest collegiate education collections in the United States. The top five ranked libraries are as follows: Milbank Memorial Library, Teachers College, Columbia University; Department of Education Research Library; Gutman Library, Harvard Graduate School of Education; Cubberley Library, Stanford University; and North Dwight Harris College Library, National College of Education.

[5]The contemporary collection consists of books published from 1965 to the present. The historical collection consists of books published before 1965.

During the 1980s, the Library's nonpersonnel expenditures decreased by 62 percent. Beginning in fiscal year 1988, technical service contracts for such things as cataloging and preserving its collections were unfunded. Consequently, about half of the collections remain uncataloged and generally not readily accessible to prospective users. In addition, many books in its historical and special collections remain in need of preservation.

Library Lacks Collection Development Policy

The Library's mission is to provide a full range of education information services to a wide array of users. These users generally include departmental staff, other federal agencies, the Congress, the Executive Office of the President, associations, educators, scholars, researchers, policymakers, and other members of the public. At the time of our review, the Library lacked a collection development policy, which defines a library's purpose, designates the primary and other users as specified in a library mission statement, and specifies the needs and services to be provided for each user group.

According to the American Library Association and other library experts, a collection development policy is needed to make effective day-to-day decisions regarding acquisition and preservation of materials that meet the needs of designated users. In addition, a mission statement and collection development policy, together, form the basis for the Secretary of Education's decisions regarding the Library.

Without a collection development policy, the Library's contemporary collection has been largely influenced by the interests of various Secretaries of Education. Consequently, according to Library officials, areas in which Secretaries have expressed little interest are the least comprehensive areas of the contemporary collection. Further, such a policy helps ensure that a library systematically takes into account the needs of its users and its resources for cataloging and preservation services before accepting gifts of library materials. Currently, the Library accepts a broad range of gifts of library materials without such consideration.

Education officials told us that an OERI Library Advisory Committee is revising the mission statement to better target library services and drafting a collection development policy for expected implementation in August 1991. This effort began in 1989.

Experts Believe Historical Collections Are Valuable

Although the Library's entire collection of books and periodicals has never been systematically inventoried or evaluated, experts agree that the historical collections, especially textbooks, are very valuable. Experts believe the contemporary collection for scholarly research is less comprehensive than the historical collection. This is partly due to a decline in acquisition of materials during the mid-1950s to the mid-1980s, when Library operations experienced several organizational and geographic changes.

Experts agree that the Library provides information unavailable in other libraries with strong education collections. For example, they said that the Library contains unique materials on the nation's 19th century educational system, including the education of the American Indian. In addition, they said that

- the selection of early American journals and materials on the history of American colleges is excellent,
- the textbook collection is one of the three or four best in the country, and
- the textbook collection is particularly strong between 1890 and 1950.

Experts also agree that the Library's contemporary collection is less comprehensive; therefore, it does not attract outside researchers as the historical collection does. However, Education officials said that the contemporary collection is more useful than the historical collection to their staff.

According to the former head of the NIE Library, the contemporary collection did not grow from the mid-1950s through the mid-1980s for two reasons. First, the Library was moved from the Federal Security Agency to HEW when the Department was established in 1953. Because education was a small part of HEW operations, library acquisitions of education materials were not emphasized. Secondly, in 1974 the precursor to the current library was established as part of NIE and between 1974 and 1987 was moved three times. Such moves disrupted the operations, according to the former head of the NIE Library.

Library Is Underused by Department Staff

According to a July 1989 Education survey of departmental staff, the Research Library is underused. The survey showed that while 63 percent of its employees need library services in their work, only 42 percent have ever used the Library. Employees said that the Library's inconvenient location and lack of needed materials were the major reasons for

its relatively low use. (See app. III.) In response to the survey results, in April 1990, Education opened a satellite library in the headquarters building on Maryland Avenue, Washington, D.C.

Library officials attribute the perceived gaps in library materials, particularly up-to-date periodicals, to budget cuts over the last few years. From fiscal years 1980-90, the Library's nonpersonnel expenditures in 1980 dollars decreased by 62 percent. (See app. IV.)

Interest in Publicizing and Improving Access to the Library

Education researchers and others outside the federal government in need of gathering education information are generally unaware of the Library's various collections. In some cases, they did not know the Library existed. Representatives from 11 of the 20 organizations we surveyed stated that their staffs rarely or never use the Library to gather education information. Of the 11 organizations, 7 said that their staffs were not aware of the Library or its collections. Several organization representatives we surveyed said that the Library needs to improve its accessibility to the public. Such access is important, they said, because their members have difficulty obtaining education information and reference materials from other sources. (See app. V.) According to them, public access could be improved by better publicizing the Library's collections and services and improving dissemination of library materials. They suggested publishing bibliographies of Library materials and summaries of the research available through the Library.

Cataloging, Maintenance, and Preservation of Library Collections Are Inadequate

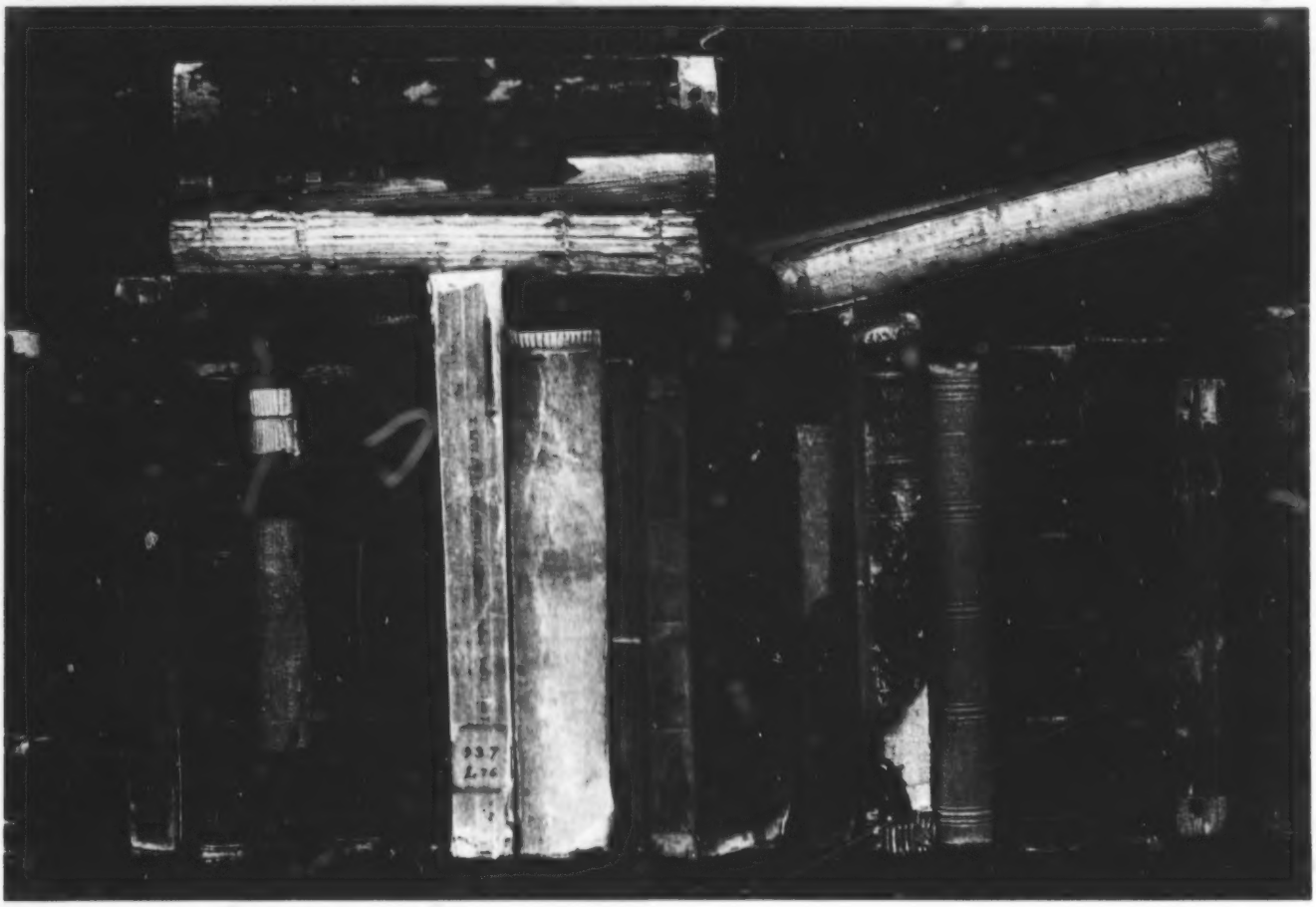
Library officials told us that about one-half of the Library's estimated 250,000-300,000 volumes are not cataloged,[6] and thus generally are not retrievable and useful to users. The uncataloged volumes include books in the historical and textbook collections and Education publications and products, such as classroom curricula and other materials developed under federally funded grants. Library officials believe that the uncataloged books also include rare or otherwise valuable books.

In addition, about 40,000 books in the historical and rare book collections are poorly maintained and preserved. The books are improperly shelved and in need of rebinding and other preservation services, such

[6]Cataloging makes materials available and retrievable by assigning each item in the collection a unique classification code and preparing other descriptive information. Education's Library participates in the On-Line Computer Library Center (OCLC) network through which member libraries share bibliographical information about cataloged material.

as paper stabilization and special environmental controls (see fig. 1). Library officials estimate the cost of rebinding to be $200,000.

Figure 1: Historic Books Improperly Shelved and in Need of Rebinding



Library officials believe that these books need immediate attention if they are to be preserved. Due to a shortage of adequate space, these books are tightly shelved and stored in rooms with poor ventilation. Recently, old wooden shelves collapsed because they could no longer support the weight of the books (see fig. 2). These factors contribute to and accelerate book deterioration.

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Figure 2: Books on Floor After Shelves Collapsed

Library officials attributed the backlog in cataloging and deficiencies in maintenance and preservation of materials to a lack of staff and funding. For example, the Library lacks staff qualified to do original cataloging.[7] In fiscal year 1988, due to budget constraints, the Library

[7]Original cataloging is done when no previous cataloging record on OCLC can be found. Many historical and rare books require original cataloging.

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ended its contract for technical services, which primarily included cataloging. Currently, the Library's ability to contract out for cataloging and preservation services is limited. The Library Services and Construction Act Amendments prohibit the Library from contracting out for services exceeding $50,000 until September 30, 1991.

Conclusion

At the time of our review, the Education Research Library was of limited usefulness. For example, about half of its estimated 250,000 volumes are uncataloged and thus, not readily accessible to users, and some 40,000 rare and historical books require rebinding or other preservation services. Further, the Library is underused by Education staff and many researchers are unaware of the facility and its services. OERI has appointed an advisory committee to articulate a collection development policy for the Library. Such a policy is needed to define the expected library user and determine acquisition and preservation practices. No policy existed at the time of our review.

In the absence of such a policy, it is unclear if the current historical collection of books should be maintained at Education's Library or at some other library. Similarly, it is unclear whether the contemporary collections are adequate.

Recommendation to the Secretary of Education

We recommend that the Secretary determine the scope and responsibility of Education's Library and assure that, in line with this determination, the OERI Library Advisory Committee revise the Library's mission statement and design a collection development policy in a timely fashion. Thereafter, the Secretary should make sure that resources budgeted are consistent with the Library's mission and collection development policy.

Agency Comments

Education reviewed a draft of the report. It generally agreed with our findings and affirmed its commitment to improving the Library's services. In addition, Education suggested changes to clarify the report which we incorporated as appropriate. (See app. VI.)

We are sending copies of this report to the Secretary of Education and other interested parties. If you or your staffs have any questions concerning this report, please call me on (202) 275-1793. The major contributors to this report are listed in appendix VII.

Franklin Frazier

Franklin Frazier
Director, Education and
Employment Issues

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Abbreviations

ERIC	Educational Resources Information Center
HEW	Department of Health, Education, and Welfare
NIE	National Institute of Education
OCLC	On-Line Computer Library Center
OERI	Office of Educational Research and Improvement

Education and Library Associations Interviewed by GAO

Organization	Location	Full-time staff	Members
American Association of School Administrators	Arlington, VA	65	18,770
American Association of University Professors	Washington, DC	34	44,000
American Education Research Association	Washington, DC	22	17,000
American Federation of Teachers	Washington, DC	140	700,000
American Library Association	Chicago, IL	225	50,000
Association of Research Libraries	Washington, DC	16	190
Business Roundtable	Washington, DC	4	200
Conference Board	New York, NY	250	2,000
Council of Chief State School Officers	Washington, DC	45	57
Department of Defense Dependent Schools	Arlington, VA	84	11,000
National Alliance of Business	Washington, DC	100	2,000
National Association of State Boards of Education	Washington, DC	100	650
National Education Association	Washington, DC	500	2,000,000
National Governors' Association	Washington, DC	100	55
National Parent Association	Washington, DC	78	6,800,000
National School Boards Association	Alexandria, VA	175	52
Office for Advancement of Black Public Colleges	Washington, DC	30	149
Phi Delta Kappan	Bloomington, IN	76	135,000
Quality Education for Minorities Network	Washington, DC	8	14,000
United States Student Association	Washington, DC	5	250

Department of Education Research Library Collections

Primary Collections

The Library's primary collections include:

- A circulating contemporary collection of more than 60,000 volumes published since 1965. These books cover major works in the field of education, as well as public policy, psychology, and the social sciences.
- About 800 current periodical subscriptions and about 1,500 periodical titles, including newspapers, congressional materials, and other government publications.
- The complete microfiche collection of the Educational Resources Information Center (ERIC) system,[1] which contains thousands of reports, including unpublished research studies.
- A reference collection consisting of, among other things, current dictionaries, encyclopedias, education and general subject indexes, and access to automated data bases.

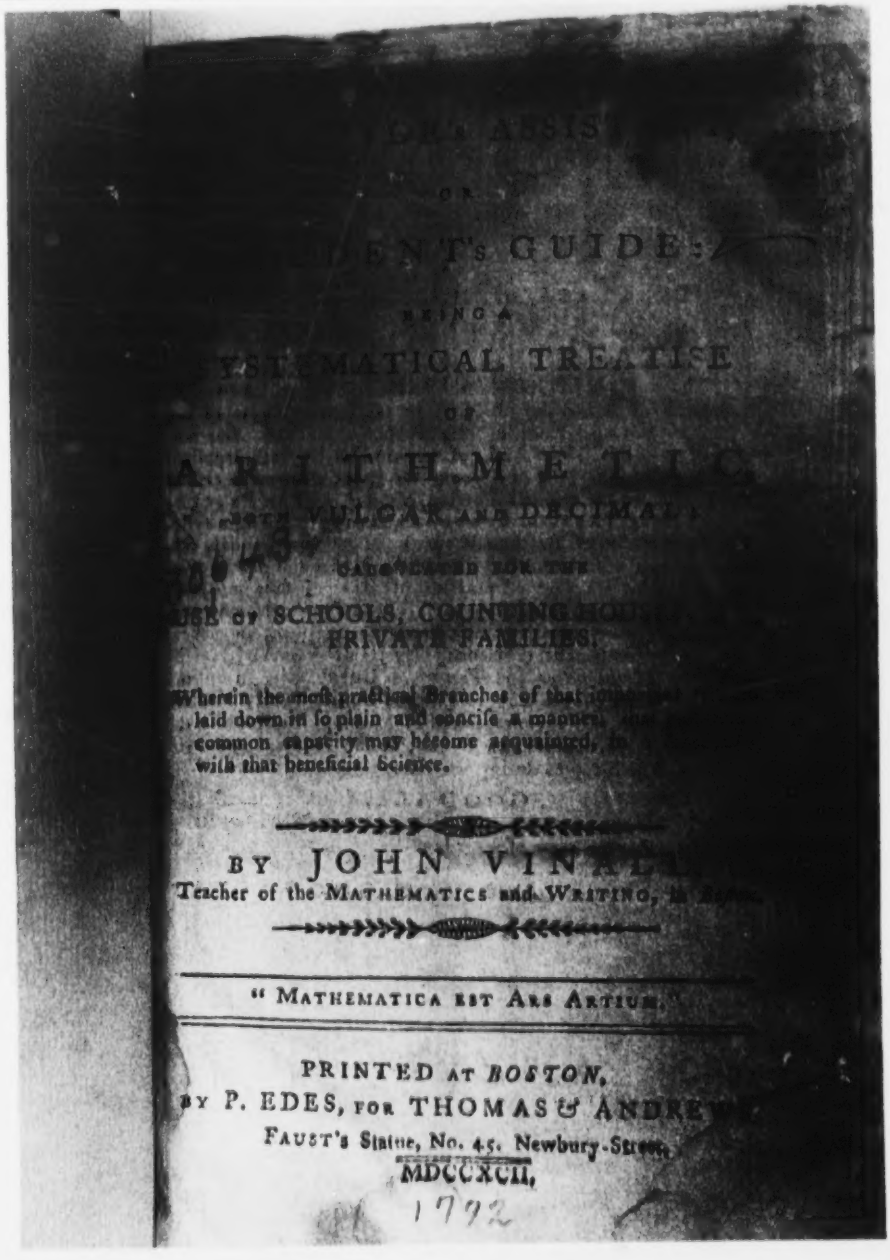
Special Collections

The special collections, which contain materials dating to the 15th century, include:

- Nearly 500 rare books, published before 1800, mostly in the field of education. Much of the collection was donated by Henry Barnard, the first Commissioner of Education. Barnard, interested in establishing an educational library, left his own extensive private collection of books on education with the Bureau of Education when he resigned as commissioner in 1870. The rare book collection contains volumes published during the 15th to 18th centuries. The earlier books are primarily in Latin, with some in Italian and German. About 200 of the rare books—primarily textbooks—have been restored and are cataloged (see fig. II.1).

[1]This system is an OERI-funded nationwide information network that provides users access to education literature. The ERIC data base consists of unpublished papers, conference proceedings, literature reviews, curriculum material, and other state and local education publications, as well as articles from nearly 800 journals.

Figure II.1: Arithmetic Text, Published in 1792, Dedicated to John Hancock and Believed to Be Signed by Him



GUIDE:

BEING A

SYSTEMATICAL TREATISE

OF

ARITHMETIC,

VULGAR AND DECIMAL:

CALCULATED FOR THE

USE OF SCHOOLS, COUNTING HOUSES

AND PRIVATE FAMILIES.

Wherein the moſt practical Branches of that Science are

laid down in ſo plain and conciſe a manner, that the

common capacity may become acquainted, in a ſhort time,

with that beneficial Science.

BY JOHN VINAL,

Teacher of the MATHEMATICS and WRITING, in Boſton.

" MATHEMATICA EST ARS ARTIUM. "

PRINTED AT *BOSTON*,

BY P. EDES, FOR THOMAS & ANDREWS,

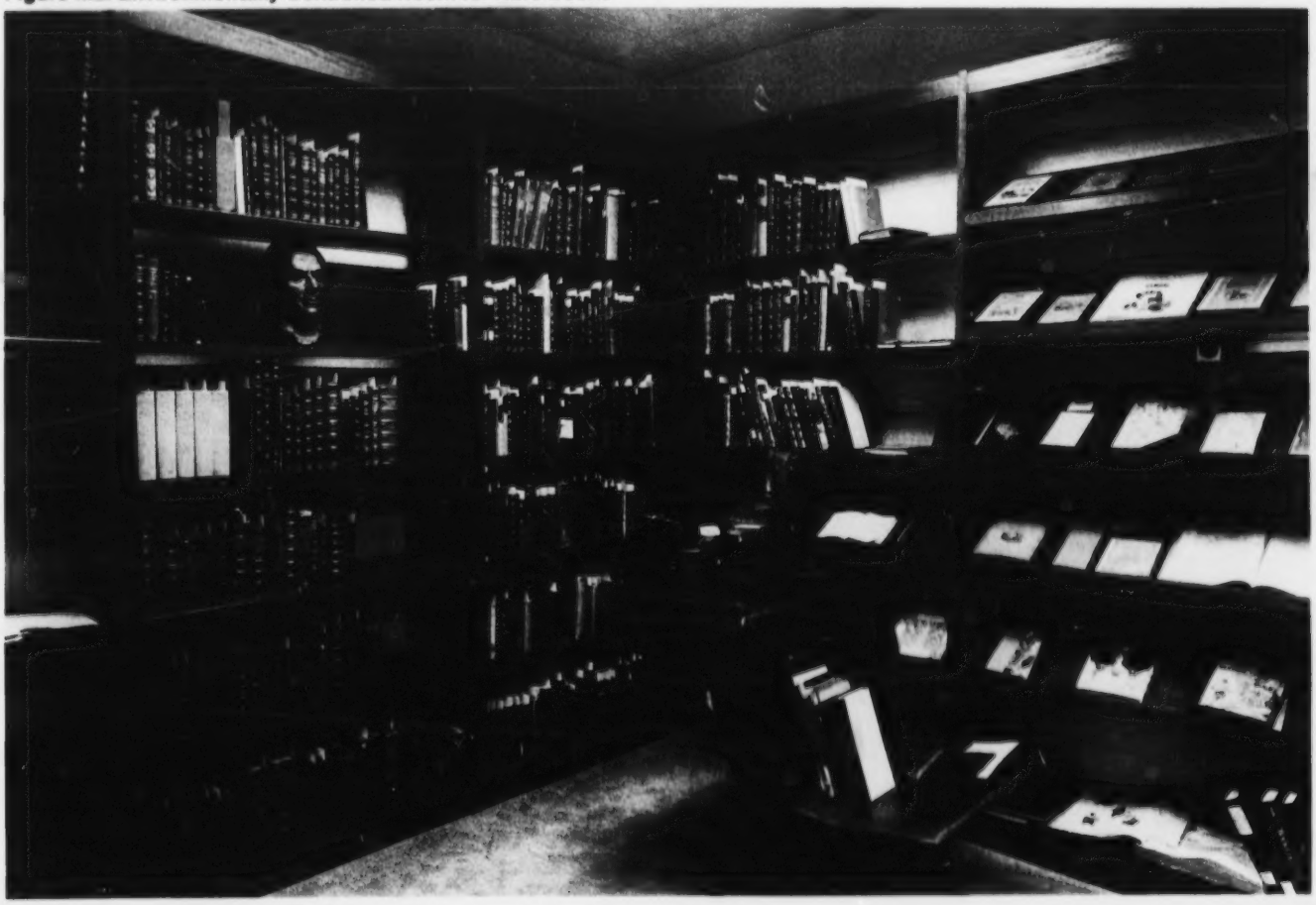
FAUST's Statue, No. 45. Newbury-Street.

MDCCXCII.

1792

These books are housed in a special environmentally controlled room (see fig. II.2). The room is kept locked and only opened on special request.

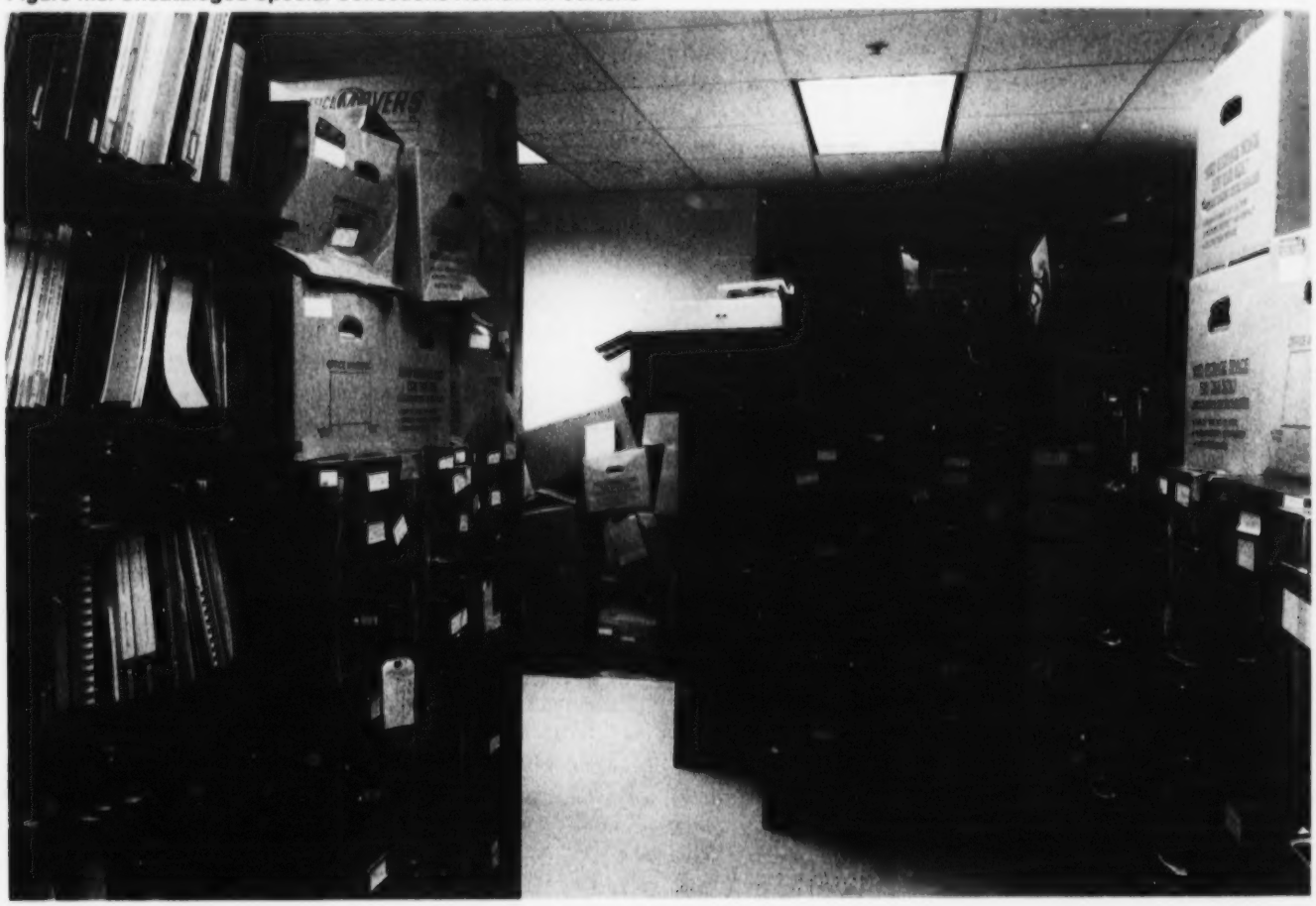
Figure II.2: Environmentally Controlled Room for Rare Books



- Three textbook collections—early American (1775-1900), modern American (1900-1959), and current American textbooks (1960-present). Many of the books were part of Henry Barnard's private collection. They cover a variety of disciplines ranging from art education to zoology. The 40,000 textbooks in the early American collection have not been cataloged; they are tightly shelved in a locked, dusty storage room; and many need new binding.

- About 5,000 children's books, including classics, prizewinning books, and various other types of literature, such as plays and poetry.
- Historical book collection consisting of a circulating collection of more than 150,000 volumes dating from 1800 to 1964. The collection includes the education-related holdings of the former HEW.
- State education journals dating back to the late 1800s. The collection came from HEW and the National Education Association.
- The Kathryn Heath and Elaine Exton Collections, which contain policy-relevant materials from the 1930s to 1970s. Both collections are packed in cartons and have not been cataloged (see fig. II.3). Kathryn Heath donated the collection named after her. She was the Assistant Commissioner for Special Studies in the Office of Education. The collection includes legislative materials, reports, evaluations, and policy documents from the 1950s and 1960s. Elaine Exton, a Washington, D.C., area journalist, willed the collection named after her. The collection contains materials dating back to the 1930s, including substantial materials on World War II, international education, and international youth.

Figure II.3: Uncataloged Special Collections Remain in Cartons



Other special collections include international education periodicals and educational products. The products, including children's games, were developed by school districts through funding from Department grants and identified through the Department's National Diffusion Network. According to a Library official, the products are proprietary because some school districts that developed the products sell them and, therefore, Library users are not permitted to check out the materials.

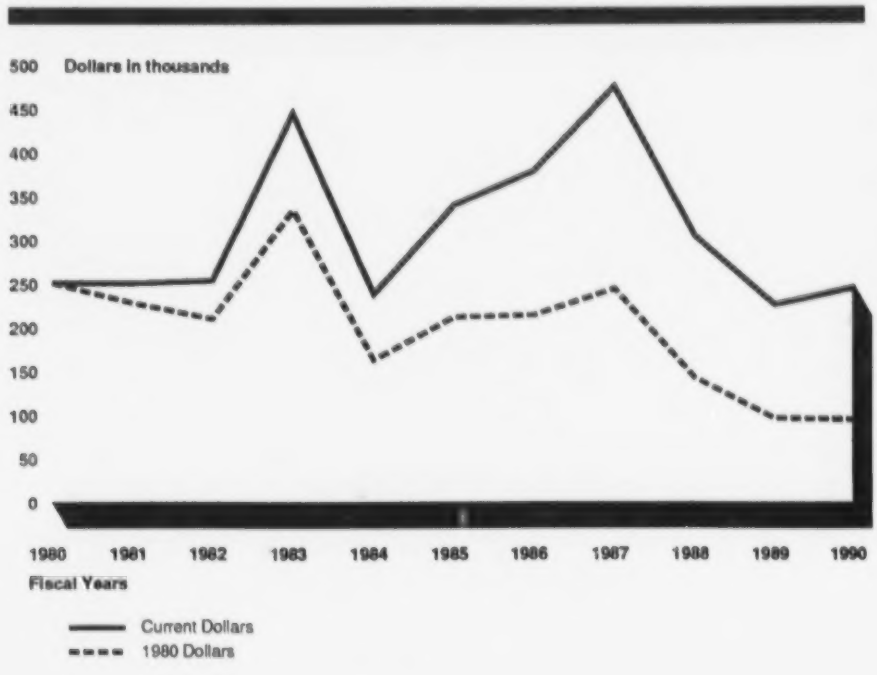
Effectiveness of Research Library's Services Provided to Education Employees

According to a July 1989 Education survey of its staff, the Research Library is underused. The survey showed that while 63 percent of its employees need library services in their work, only 42 percent have ever used the Library. About half of the individuals using the library said they use it less than once a month, while the other half use it once a month or more. Employees said that the Library's inconvenient location and lack of needed materials were the major reasons for its relatively low use.

In April 1990, Education established a satellite library in its headquarters to help increase its employees' library use. The satellite operation primarily provides users access to data bases describing the collections located in or retrievable by the main library, offers legislative reference and research services, and has a few newspapers, journals, and other reference materials. Once an employee identifies needed material available in the main library, the staff arrange for messengers to deliver the material to the satellite or transmit the materials by fax. Because of the short time the satellite library has been in operation, we did not determine if employees' usage of available library services has increased.

Education researchers and others outside the federal government in need of gathering education information generally are unaware of the Library's various collections. In some cases, they did not know it existed, according to experts and representatives of education organizations. Representatives from 11 of the 20 organizations we interviewed stated that their staffs rarely or never use the Library to gather education information. Representatives of the other 9 organizations said that their staffs sometimes or always used the Library to obtain needed information. Of the organizations rarely or never using the Library, most (7 of 11) said that their staffs did not know it existed or about its collections.

Department of Education Research Library Nonpersonnel Expenditures (Fiscal Years 1980-90)



Views on Expanding Public Access to Research Library

In the opinion of library experts and representatives of 15 of the 20 education organizations we interviewed, the Research Library needs to increase public access. Three recent studies conducted or commissioned by Education proposed several alternatives for improving public access, but no further action has been taken.

Several of these representatives said that expanding public accessibility would likely improve users' ability to obtain needed data. Interview respondents said that increased public accessibility is important because their members have difficulty obtaining education information and reference materials from any library or other sources. More than half of the organizations said that their members have either moderate or great difficulty in obtaining needed information, such as historical and legislative documents (copies of legislation or congressional hearing transcripts) and accessing education data bases.

During the past 5 years, Education has developed several proposals for expanding the Library's role to better serve the public's education information needs. A 1985 NIE proposal to the Secretary of Education focused on the possibility of creating a National Education Library. The proposal stated that such a library could become the principal American center for collection, access, preservation, and effective use of education-related resources. It proposed expanding the Library's staff from 20 to 60 and increasing its annual budget from $315,000 to $7 million.

Two 1989 studies[1] commissioned by Education evaluated the feasibility of the Library becoming a National Education Information Reference Center. Such a center would (1) refer the public to libraries close to their homes or businesses that contain specific information needed and (2) provide the public with answers to education-related questions. One of the two studies proposed an implementation time frame of 3 years. Although specific cost estimates were not available, the center would need less space, staff, and funding than a national library.

In January 1988, Education convened a symposium with a group of education librarians to discuss the need for an information center. Participants endorsed the need for such a center. They agreed that the Research Library should serve as a catalyst to complement and augment

[1]These studies were conducted by John W. Collins III, Librarian, Monroe C. Gutman Library, Harvard Graduate School of Education.

information collected and disseminated by OERI and to target such information to the underserved. Education has not adopted any of the studies' recommendations.

Representatives of most of the education organizations we contacted indicated that some of or all the services proposed under the National Education Information Reference Center approach would be useful to their organizations. Services that they said would be most useful included (1) an electronic network user access with major education libraries for retrieving education information; (2) a national reference service that would include, for example, computerized literature searches, document delivery, and research counseling; and (3) an index of libraries with significant collections of materials on particular topics. (See table V.1 for survey responses on the usefulness of these and other specific services.) The expanded dissemination services would target information and products to the broad constituencies of education—particularly those who are currently underserved, such as practitioners, mid-level administrators, parents, and school board members.

Table V.1: Usefulness of Proposed Education Library Services and Materials[a]

Services	Very useful	Moderately useful	Somewhat useful	Not at all useful	Does not apply	No response/ does not know
A network of user access with organizations having major education libraries and collections	9	4	4	1	1	1
Training programs for school librarians and media specialists	3	2	2	4	7	2
Internships for information specialists and librarians	5	3	1	5	6	0
Publishing services for topics on which there is a scarcity of information	10	3	2	4	2	0
National list of journals held by libraries across the country	8	2	5	3	2	0
Index of libraries with significant collections of materials on specific topics	10	3	3	3	1	0
Directory of U.S. textbook collection	4	0	4	9	3	0
Providing leadership in dissemination of education information services	8	2	3	4	0	3
Index of historical materials maintained by educational organizations	6	3	5	4	1	1
National reference service, including computerized literature searches, document delivery, and research counseling	13	3	1	2	0	1

[a]These services were taken from a Department of Education commissioned paper: "A Proposal to Establish a National Education Information Reference Center" by John W. Collins III, November 1989.

Comments From the Department of Education

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF THE ASSISTANT SECRETARY
FOR EDUCATIONAL RESEARCH AND IMPROVEMENT

APR 12 1991

Mr. Franklin Frazier
Director, Education and
Employment Issues
Human Resources Division
U.S. General Accounting Office
Washington, DC 20548

Dear Mr. Frazier:

Thank you for the opportunity to review and comment on the draft GAO report, "Department of Education Library: Actions Needed to Improve Its Usefulness." Our comments relating to misconceptions and/or specific factual errors are summarized in the enclosure to this letter. Although we agree in general with the findings cited in the report, we feel that it does not reflect some significant information that is pertinent to the congressional inquiry that led to GAO's review. In addition, we believe that the recommendation needs clarification.

Our major concerns about the report as currently presented are:

(1) The report was completed prior to the reorganization of the Office of Educational Research and Improvement. As a result of this reorganization, the Library Section and the Education Reference Center Section now report to the Director of the Office of Library Programs (LP). The reorganization should be noted in the report.

(2) Although there is acknowledgement of the two sections that form the Research Library Branch--the Library Section and the Education Reference Center Section--the report addresses primarily the Library Section, with little, if any, attention given to the Education Reference Center Section. The work of this section needs to be addressed in the report.

(3) The report confuses the purpose of a mission statement and a collection development policy. These are separate documents that are distinct but related: a collection development policy is derived from a mission statement. Because these documents form the basis for the library's operation, reflecting its scope of responsibility, the report needs to define them properly.

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(4) The recommendation centers on the collection development policy, making it the driving force behind other actions. Before a mission statement or a collection development policy can be agreed upon, the Department needs to determine the research library's role and scope of responsibility. The recommendation needs to be rewritten, reflecting the correct sequence of actions.

(5) The report indicates that the legislation requiring the GAO study specifically called for an assessment of the scholastic and historic value of the library's collection. It appears from the report that GAO did not conduct its own study of the research library's collections. If this is indeed the case, the report should reflect that GAO's findings are based on previous reports commissioned by the Department of Education which were not undertaken for the same purpose as the GAO study.

Once these concerns are addressed, we believe that the final report will be useful to the Education Department in developing the services of its research library.

Sincerely,

Christopher T. Cross
Assistant Secretary

Enclosure

Major Contributors to This Report

Human Resources Division, Washington, D.C.	Fred E. Yohey, Jr., Assistant Director, (202) 426-0800 Deborah R. Eisenberg, Assignment Manager Henry Fowler, Evaluator-in-Charge Sandra Baxter, Evaluator Robert T. Geen, Evaluator LuAnn Moy, Social Science Analyst

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